

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

<p>UNITED STATES OF AMERICA,</p> <p>Plaintiff,</p> <p>v.</p> <p>TURBO SOLUTIONS INC., f/k/a Alex Miller Financial Services Inc., d/b/a Alex Miller Credit Repair, and</p> <p>ALEXANDER V. MILLER, in his individual and corporate capacity,</p> <p>Defendants.</p>	<p>Civil Action No. 4:22-mc-00369</p> <p>ANSWER TO COMPLAINT BY DEFENDANT ALEXANDER V. MILLER, in his individual and corporate capacity; JURY DEMAND</p>
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Defendant ALEXANDER V. MILLER, in his individual and corporate capacity (“Defendant”) as and for its Answer to the Complaint [2] filed by Plaintiff UNITED STATES OF AMERICA (“the Government”) states the following:

1. Defendant ADMITS the allegations in paragraph 1 of the Government’s Complaint.
2. Defendant DENIES the allegations in paragraph 2 of the Government’s Complaint.
3. Defendant ADMITS the allegations in paragraph 3 of the Government’s Complaint.
4. Defendant ADMITS the allegations in paragraph 4 of the Government’s Complaint.
5. Defendant ADMITS the allegations in paragraph 5 of the Government’s Complaint.
6. Defendant ADMITS the allegations in paragraph 6 of the Government’s Complaint.
7. Defendant DENIES the allegations in paragraph 7 of the Government’s Complaint.
8. Defendant DENIES the allegations in paragraph 8 of the Government’s Complaint.
9. Defendant ADMITS the allegations in paragraph 9 of the Government’s Complaint.
10. Defendant DENIES the allegations in paragraph 10 of the Government’s Complaint.
11. Defendant ADMITS the allegations in paragraph 11 of the Government’s Complaint.

12. Defendant ADMITS the allegations in paragraph 12 of the Government's Complaint.
13. Defendant ADMITS the allegations in paragraph 13 of the Government's Complaint.
14. Defendant ADMITS the allegations in paragraph 14 of the Government's Complaint.
15. Defendant ADMITS the allegations in paragraph 15 of the Government's Complaint.
16. Defendant ADMITS the allegations in paragraph 16 of the Government's Complaint.
17. Defendant ADMITS the allegations in paragraph 17 of the Government's Complaint.
18. Defendant ADMITS the allegations in paragraph 18 of the Government's Complaint.
19. Defendant DENIES the allegations in paragraph 19 of the Government's Complaint.
20. Defendant ADMITS the allegations in paragraph 20 of the Government's Complaint.
21. Defendant ADMITS the allegations in paragraph 21 of the Government's Complaint.
22. Defendant ADMITS the allegations in paragraph 22 of the Government's Complaint.
23. Defendant ADMITS the allegations in paragraph 23 of the Government's Complaint.
24. Defendant ADMITS the allegations in paragraph 24 of the Government's Complaint.
25. Defendant DENIES the allegations in paragraph 25 of the Government's Complaint.
26. Defendant DENIES the allegations in paragraph 26 of the Government's Complaint.
27. Defendant DENIES the allegations in paragraph 27 of the Government's Complaint.
28. Defendant DENIES the allegations in paragraph 28 of the Government's Complaint.
29. Defendant DENIES the allegations in paragraph 29 of the Government's Complaint.
30. Defendant DENIES the allegations in paragraph 30 of the Government's Complaint.
31. Defendant DENIES the allegations in paragraph 31 of the Government's Complaint.
32. Defendant DENIES the allegations in paragraph 32 of the Government's Complaint.
33. Defendant DENIES the allegations in paragraph 33 of the Government's Complaint.
34. Defendant DENIES the allegations in paragraph 34 of the Government's Complaint.

35. Defendant DENIES the allegations in paragraph 35 of the Government's Complaint.
36. Defendant DENIES the allegations in paragraph 36 of the Government's Complaint.
37. Defendant DENIES the allegations in paragraph 37 of the Government's Complaint.
38. Defendant DENIES the allegations in paragraph 38 of the Government's Complaint.
39. Defendant DENIES the allegations in paragraph 39 of the Government's Complaint.
40. Defendant DENIES the allegations in paragraph 40 of the Government's Complaint.
41. Defendant DENIES the allegations in paragraph 41 of the Government's Complaint.
42. Defendant DENIES the allegations in paragraph 42 of the Government's Complaint.
43. Defendant DENIES the allegations in paragraph 43 of the Government's Complaint.
44. Defendant DENIES the allegations in paragraph 44 of the Government's Complaint.
45. Defendant DENIES the allegations in paragraph 45 of the Government's Complaint.
46. Defendant DENIES the allegations in paragraph 46 of the Government's Complaint.
47. Defendant DENIES the allegations in paragraph 47 of the Government's Complaint.
48. Defendant restates its answers in paragraphs 1-47 as if set forth verbatim herein.
49. Defendant DENIES the allegations in paragraph 49 of the Government's Complaint.
50. Defendant DENIES the allegations in paragraph 50 of the Government's Complaint.
51. Defendant DENIES the allegations in paragraph 51 of the Government's Complaint.
52. Defendant restates its answers in paragraphs 1-51 as if set forth verbatim herein.
53. Defendant DENIES the allegations in paragraph 53 of the Government's Complaint.
54. Defendant DENIES the allegations in paragraph 54 of the Government's Complaint.
55. Defendant DENIES the allegations in paragraph 55 of the Government's Complaint.
56. Defendant DENIES the allegations in paragraph 56 of the Government's Complaint.
57. Defendant ADMITS the allegations in paragraph 57 of the Government's Complaint.

58. Defendant DENIES the allegations in paragraph 58 of the Government's Complaint.

59. Defendant restates its responses to paragraphs 1-58 as if set forth verbatim herein.

60. Defendant DENIES the allegations in paragraph 60 of the Government's Complaint.

61. Defendant DENIES the allegations in paragraph 61 of the Government's Complaint.

62. Defendant restates its responses in paragraphs 1-61 as if set forth verbatim herein.

63. Defendant DENIES the allegations in paragraph 63 of the Government's Complaint.

64. Defendant DENIES the allegations in paragraph 64 of the Government's Complaint.

65. Defendant restates its responses in paragraphs 1-64 as if set forth verbatim herein.

66. Defendant DENIES the allegations in paragraph 66 of the Government's Complaint.

67. Defendant DENIES the allegations in paragraph 67 of the Government's Complaint.

68. Defendant restates its responses in paragraphs 1-67 as if set forth verbatim herein.

69. Defendant DENIES the allegations in paragraph 69 of the Government's Complaint.

70. Defendant DENIES the allegations in paragraph 70 of the Government's Complaint.

71. Defendant restates its responses in paragraphs 1-70 as if set forth verbatim herein.

72. Defendant DENIES the allegations in paragraph 72 of the Government's Complaint.

73. Defendant DENIES the allegations in paragraph 73 of the Government's Complaint.

74. Defendant DENIES the allegations in paragraph 74 of the Government's Complaint.

75. Defendant DENIES the allegations in paragraph 75 of the Government's Complaint.

76. Defendant restates its responses in paragraphs 1-75 as if set forth verbatim herein.

77. Defendant DENIES the allegations in paragraph 77 of the Government's Complaint.

78. Defendant DENIES the allegations in paragraph 78 of the Government's Complaint.

79. Defendant DENIES the allegations in paragraph 79 of the Government's Complaint.

80. Defendant DENIES the allegations in paragraph 80 of the Government's Complaint.

FIRST AFFIRMATIVE DEFENSE

81. Defendant asserts failure to join a party under Rule 19 as its first affirmative defense.

Wherefore, Defendant requests that the Government's Complaint be dismissed at its own costs and take nothing from Defendant.

JURY DEMAND

Defendant requests a trial by jury on all issues so triable.

Respectfully submitted,

Date: January 17, 2023

s/ Brian L. Ponder
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. TURBO SOLUTIONS INC., f/k/a Alex Miller Financial Services Inc., d/b/a Alex Miller Credit Repair, and ALEXANDER V. MILLER, in his individual and corporate capacity, Defendants.	Civil Action No. 4:22-mc-00369 CERTIFICATE OF SERVICE
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I certify that a copy of the foregoing was served upon Plaintiff today via CM/ECF filing.

Respectfully submitted,

Date: January 17, 2023

s/ Brian L. Ponder
Brian L. Ponder, Esq.
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